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9 IN THE UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.  
14 RAYMOND JESSE RODRIGUEZ,

15 Defendant.

16 CASE NO. 1:24-CR-00142-KES-BAM

17

18 **STIPULATION TO CONTINUE STATUS  
CONFERENCE AND EXCLUDE TIME; AND  
ORDER**

19 The parties stipulate as follows:

20 1. A grand jury indicted the defendant on June 20, 2024, charging him in count one of  
21 violating 18 U.S.C. § 922(g)(1) – Felon in Possession of Ammunition. The defendant appeared and was  
22 detained on June 21, 2024. This case is set for a status conference on February 26, 2025. Time has been  
excluded to that date.

23 2. The government produced initial discovery on June 26, 2024, and supplemental discovery  
24 on July 22, 2024. On August 6, 2024, defense made a plea offer to the government. The government made  
25 its own plea offer on October 15, 2024, which had expired.

26 3. On December 9, 2024, defendant's counsel withdrew, and the Court appointed Adilene  
27 Flores Estrada to represent the defendant on December 13, 2024. The government re-produced its  
28 discovery to Ms. Flores Estrada on December 17, 2024. The government intends to extend a plea offer to

1 the defendant's new counsel.

2 4. Now, the parties agree to continue the status conference from February 26, 2025, to April  
3 9, 2025, to further provide defendant with reasonable time necessary for effective preparation, so that the  
4 defendant can review the discovery, and for defendant to consider a pre-trial resolution of the case.

5 5. The parties agree that the interests of justice served by granting this continuance outweigh  
6 the best interests of the public and the defendant in a speedy trial. The parties also agree that the period  
7 from February 26, 2025, through April 9, 2025, should be excluded. Fed. R. Crim. P. 17.1; 18 U.S.C. §  
8 3161(h)(7)(A) and (h)(7)(B)(iv).

9 IT IS SO STIPULATED.

10 Dated: February 13, 2025

11 MICHELE BECKWITH  
12 Acting United States Attorney

13 */s/ Cody Chapple*  
14 Cody Chapple  
15 Robert L. Veneman-Hughes  
16 Assistant United States Attorney

17 Dated: February 13, 2025

18 */s/ Adilene Flores Estrada*  
19 Adilene Flores Estrada  
20 Law Office of Adilene Flores Estrada  
21 Counsel for RAYMOND JESSE  
22 RODRIGUEZ

## ORDER

The Court has read and considered the parties' stipulation to continue the status conference and exclude time. The Court finds there is good cause for the continuance so as to allow the defendant reasonable time to complete his review of the discovery and fully consider a pre-trial resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

Therefore, for good cause shown:

1. The status conference is continued from February 26, 2025, until **April 9, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**; and
2. The period from February 26, 2025, through April 9, 2025, shall be excluded pursuant to Fed. R. Crim. P. 17.1; 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: **February 13, 2025**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE